

EXHIBIT 3

Exhibit C: Specifications for the Production of Documents**1. Cover Letter and Delivery Media**

Each production shall include a cover letter or cover email with information sufficient to: (i) identify all accompanying delivery media; (ii) identify the production on such media by assigning a Volume ID; and (iii) include the Bates range for the documents produced in each volume. Delivery media shall comply with the specifications below.

	a) Requirement:
Delivery Media:	USB hard drive, DVD and/ or CD-R (ISO9660 format) or a secure FTP site
Encryption:	All media should be encrypted
Volume ID:	CD set number, e.g. VOL1
Physical Media Label:	TOP: <production name, volume number> MIDDLE: <Bates range> BOTTOM: <date>
Number of Copies:	1

2. Deliverables Include

Item:	Requirement:
a) Load File (Metadata file)	Concordance (.dat)
b) Image File	Opticon (.opt)
c) Images	<ul style="list-style-type: none"> • Group IV TIFF, 300 DPI, single-page TIFF images • Color documents should be produced in black & white, with color copies to be provided as the Receiving Party's request so long as reasonable and proportional to the needs of the litigation. • All black/white images must be in 1-bit TIFF images and color documents must be in 24-bit JPEG files • All documents referenced in a production image load file shall have all corresponding images, text, and data • All images in the delivery volume shall be contained in the image load file • The image key shall be named the same as the Bates number of the page • Every image will contain a unique Bates number, and a prefix that identifies the party producing the document • The Bates numbers shall be sequential, and in a consistent font type, size, and spacing. • Image file names cannot contain spaces, (e.g., the correct format would be AB00000001 not AB 00000001). • If a Bates number or set of Bates numbers is skipped in a production, the producing party will so note in a cover letter or production log accompanying the production.

Item:	Requirement:
d) Text Files	<ul style="list-style-type: none"> • Extracted text of a document must be delivered on a document level • A text file will be provided for every document • For any document without extracted text or OCR, a text placeholder file will be inserted • All text for a single document should be contained within one file with subfolders • OCR shall be performed: <ul style="list-style-type: none"> ○ For all redacted images ○ For all non-searchable electronic documents (including scanned hard copy documents) for which the text cannot be extracted. ○ Branding and endorsement shall be performed <i>after</i> OCR in the format agreed to by the parties. • All text files should be named after the beginning Bates number of the document (ProdBatesBeg.txt)
e) Native Files	<ul style="list-style-type: none"> • Native file format for: <ul style="list-style-type: none"> ○ Spreadsheets (e.g., MS Excel, Lotus 123, etc.) ○ Presentations (e.g., MS PowerPoint, etc.) ○ Database (e.g., MS Access, QuickBooks, etc.) ○ Drawing (e.g., Visio, CAD, etc.) ○ Audio and Video (e.g., QuickTime Movie, Windows Media Video Voicemails) ○ Other file types that cannot practicably be converted to image format. • All Native files should be named after the beginning Bates number of the document (BEGDOC.xls). • Documents produce in native format should be produced with a single page TIFF placeholder endorsed the Prod Beg Bates and the following language on the placeholder: "Document produced in native format." • Documents produced in native format should have a file path value for the native file in the "Native Link" metadata field.
f) Exception Handling	A single-page TIFF placeholder should be used for each document within a family that was not converted and endorsed with the Prod Bates Beg and exception reason.
g) Display Hidden Text	Maintain and display hidden text (i.e., force on all hidden data). For example, track changes in MS Word, speaker notes in MS PowerPoint, and hidden rows in MS Excel.
h) Maintain Date and Time	Maintains the date/time of the document as it was last saved, edited, etc., not the date of collection or processing (I.e., force off auto data).

3. Directory Structure

The directory structure will contain the following main folders: DATA, NATIVE, TEXT, and IMAGES. Ex: Vol1\ NATIVE\000X\

	Requirement:
DAT File Location	In subfolder: \DATA

OPT File Location	In subfolder: \DATA
Images	In subfolder: \IMAGES In sequentially numbered subfolders containing approximately 1000 images each (i.e. ..\Images\001)
Text Files	In subfolder: \TEXT
Native Files	In subfolder. i.e. \NATIVE

4. Delimiters

	Requirement		
Field Separator	ASCII Code 20 ()	Separates load file columns	
Field Values	ASCII Code 254 (p)	Marks the beginning and end of each load file field (also known as a text qualifier)	
Multi-value	ASCII Code 059 (;)	Separates distinct values in a column. This delimiter is only used when importing into a Relativity multi-choice field	
Newline	ASCII 174 Code (®)	Marks the end of a line in any extracted or long text field	
Null Fields		If a Field has no value, leave blank	

5. Metadata

Field Name	Field Description	Format	File Type	Hard Copy
AttachCount	Number of attachment(s)	NUMERICAL	Populated for messages and attachments only.	Populated
Author	Original composer of document.	TEXT	Populated attachments and loose files.	
Confidentiality	Confidential status of document.	TEXT	Populated for messages, attachments and loose files.	Populated
Conversation ID	Email thread created by the email system. This is a 44-character string of numbers and letters that is created in the initial email and has 10 characters added for each reply or forward of an email.	TEXT	Populated for messages only.	
Custodian or Source	Name of custodian who possessed the document.	TEXT	Populated for messages,	Populated

Field Name	Field Description	Format	File Type	Hard Copy
			attachments and loose files.	
All Custodians	Name of all custodians who possessed (i.e., To, From, BCC, CC) the document, prior to de-duplication.	TEXT	Populated for messages, attachments and loose files.	Populated
All File Paths	The location of each file, for duplicate custodians, prior to de-duplication.	TEXT	Populated for messages, attachments and loose files	Populated
Date Created	Date from the date created property extracted from the original file or email message.	DATE (MM-DD-YYYY)	Populated for attachments and loose files.	
Date Last Modified	Date from the modified property of a document, representing the date and time that changes to the document were last saved.	DATE (MM-DD-YYYY)	Populated for attachments and loose files.	
Date Received	Date that the email message was received (according to original time zones).	DATE (MM-DD-YYYY)	Populated for messages. Attachments will inherit from the parent message.	
Date Sent	Date that the email message was sent (according to original time zones).	DATE (MM-DD-YYYY)	Populated for messages. Attachments will inherit from the parent message.	
DocType	Populated with: Email, Attachment, eDocPaper	TEXT	Populated for messages, attachments and loose files.	Populated
Email BCC	Recipients of 'blind carbon copies' of the email message.	TEXT	Populated for messages only.	
Email CC	Recipients of 'carbon copies' of the email message.	TEXT	Populated for messages only.	
Email From	Originator of the email message.	TEXT	Populated for messages only.	
Email Subject	Subject of the email message	TEXT	Populated for messages only.	

Field Name	Field Description	Format	File Type	Hard Copy
Email To	List of recipients or addressees of the email message.	TEXT	Populated for messages only.	
File Extension	Three (or more) character extension of the document that represents the file type to the Windows Operating System. Examples are PDF, DOC, or DOCX. The file extension is identified by the file header vs. the file extension of the file name itself.	TEXT	Populated for messages, attachments, and loose files.	
File Name	Original name of the file.	TEXT	Populated for messages, attachments, and loose files.	
File Size	File size in kilobytes of native document.	DECIMAL	Populated for messages, attachments, and loose files.	
MD5 Hash Value	Identifying value of an electronic record that can be used for deduplication and authentication generated using the MD5 hash algorithm	TEXT	Populated for messages, attachments and loose files.	
Original Folder Path	Original folder path of file or folder name for paper documents.	TEXT	Populated for messages, attachments and loose files.	Populated
Prod Bates Beg	Beginning Bates number, or production number, on first page of document.	TEXT	Populated for messages, attachments and loose files.	Populated
Prod Bates Beg Attach	First Bates number in family group.	TEXT	Populated for messages and attachments.	Populated
Prod Bates End	Bates number, or production number, on last page of document.	TEXT	Populated for messages, attachments and loose files.	Populated
Prod Bates End Attach	Last Bates number in family group.	TEXT	Populated for messages and attachments.	Populated

Field Name	Field Description	Format	File Type	Hard Copy
Redactions	Redaction status of document.	TEXT	Populated for messages, attachments and loose files.	Populated
Time Created	Time from the Date Created property extracted from the original file or email message.	TEXT (hh:mm:ss)	Populated for attachments and loose files.	
Time Last Modified	Time from the Modified property of a document, representing the date and time that changes to the document were last saved.	TEXT (hh:mm:ss)	Populated for attachments and loose files.	
Time Received	Time that the email message was received (according to original time zones).	TEXT (hh:mm:ss)	Populated for messages. Attachments will inherit from the parent message.	
Time Sent	Time that the email message was sent (according to original time zones).	TEXT (hh:mm:ss)	Populated for messages. Attachments will inherit from the parent message.	
Title	Title information saved in metadata with document.	TEXT	Populated for attachments and loose files.	
Native Link	Link to Native File. Native files should be named the same as the beg doc and delivered in the same folder as the images (e.g., ABC0000001.xls).	TEXT	Populated for attachments and loose files.	Populated
Text Link	Link to Text Files. Text files should be named the same as the beg doc and delivered in the same folder as the images (e.g., ABC0000001.txt).	TEXT	Populated for attachments and loose files.	